

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF MISSOURI
SOUTHEASTERN DIVISION

FILED

APR 04 2023

U. S. DISTRICT COURT
EASTERN DISTRICT OF MO
CAPE GIRARDEAU

UNITED STATES OF AMERICA,

Plaintiff,

v.

SHERI L. REEVES,

Defendant.

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1:23CR00058 SNLJ-ACL

No.

Title 18, U.S.C. §§ 1344 & 2, 1349 & 1343

INDICTMENT

The Grand Jury charges:

A. INTRODUCTION

At all times relevant to this indictment:

1. Bank of America was and is a financial institution insured by the federal government through the Federal Deposit Insurance Corporation.

2. The defendant, **SHERI L. REEVES** ("Defendant") is a resident of Kennett, in Dunklin County, in Eastern District of Missouri.

B. THE SCHEME TO DEFRAUD

3. Beginning at a time unknown to the Grand Jury, but including on or about June 9, 2020, and continuing to on or about November 3, 2020, in the Eastern District of Missouri, and elsewhere, the defendant,

SHERI L. REEVES,

knowingly aided and abetted individuals known and unknown to the Grand Jury, in devising a scheme and artifice to obtain moneys, funds, assets, and property, owned by and under the custody

and control of federally insured financial institutions by means of false and fraudulent pretenses, representations, and promises; and for the purpose of executing such scheme or artifice to defraud, and attempting to do so, deposited or caused to be deposited cashiers checks, and other matters and things to be sent or delivered by any private or commercial interstate carrier, and took and received therefrom, any such matter or thing; and transmitted, and caused to be transmitted by means of wire communications in interstate and foreign commerce, writings, signs, signals, pictures, or sounds, including wire transfers of fraudulently obtained funds, for the purpose of executing such scheme or artifice to defraud.

C. MANNER AND MEANS

The scheme and artifice to defraud was in substance as follows:

4. It was part of the scheme and artifice to defraud that in 2020, Defendant began acting as a money courier for individuals known and unknown to the Grand Jury.

5. It was further part of the scheme and artifice to defraud that in her capacity as a money courier, on June 9, 2020, Defendant opened an account using her personal identifying information at the Bank of America, a financial institution whose deposits were insured by the Federal Deposit Insurance Corporation (FDIC), at a branch facility located in Jonesboro, Arkansas. Defendant later received, in her Bank of America account, the proceeds of various fraud schemes executed by individuals known and unknown to the Grand Jury.

6. Prior to October 21, 2020, Defendant added another person, a victim of the fraud scheme, to her account with Bank of America.

7. It was further part of the scheme and artifice to defraud that the proceeds accepted by Defendant included those obtained from an account take-over fraud, whereby Defendant and

others involved in the scheme used fraudulently obtained account information to access a victim's bank account with the Bank of America , then, in three separate electronic transactions, transferred approximately Five Hundred Sixty Five Thousand Dollars (\$565,000) from the victim's Bank of America account in Dallas, Texas, to the account opened by the Defendant in a branch facility of Bank of America located in Jonesboro, Arkansas. Those transactions were made in the amount of \$200,000.00 on or about October 20, 2020; in the amount of \$180,000.00 on or about October 23, 2020; and in the amount of \$185,000.00 on or about October 26, 2020.

8. It was further part of the scheme to defraud that once Defendant received the proceeds of various fraud schemes, she subsequently transferred those funds to confederates via cashier's checks obtained in Tennessee and Arkansas by using private and commercial interstate carriers; and by transmitting and causing to be transmitted by means of wire communications in interstate commerce, writings, signs, signals, pictures and sounds, via Coin Flip cryptocurrency transactions conducted in Dunklin County, Missouri.

9. It was further part of the scheme and artifice to defraud that Defendant provided the information for the financial accounts she had opened to individuals known and unknown to the Grand Jury.

10. It was further part of the scheme and artifice to defraud that Defendant withdrew, and attempted to withdraw, the illegal proceeds through cash and check transactions.

11. It was further part of the scheme and artifice to defraud that, between the dates of June 9, 2020, and November 3, 2020, Defendant traveled from her residence in Dunklin County, Missouri, to locations in Arkansas and Tennessee, and mailed fraud proceeds from those locations

in interstate commerce to individuals known and unknown to the Grand Jury through Federal Express, a private and interstate commercial carrier.

12. It was further part of the scheme and artifice to defraud that Defendant deposited cash derived from the illegal scheme and artifice to defraud in crypto currency devices and sent proceeds from the illegal scheme converted into crypto currency to other participants in the scheme in interstate commerce via a Coin Flip device located in Kennett, Missouri.

COUNT 1
(Bank Fraud)

13. The allegations contained in paragraphs 1 through 12 of this Indictment are incorporated by reference as if fully set out herein.

14. Beginning at a time unknown to the Grand Jury, but including June 9, 2020, and continuing to on or about November 3, 2020, in Dunklin County, in the Southeastern Division of the Eastern District of Missouri, and elsewhere, the defendant,

SHERI L. REEVES,

did aid and abet persons known and unknown to the Grand Jury in knowingly and intentionally executing a scheme or artifice to defraud a financial institution, and to obtain any of the moneys, funds, assets, or other property owned by or under the custody and control of Bank of America, a financial institution federally insured by the Federal Deposit Insurance Corporation, by means of material false or fraudulent pretenses, representations or promises, in that **SHARI L. REEVES** assisted in the transfer of and did receive fraudulently obtained and transferred funds from a Bank of America account in Dallas, Texas, into a Bank of America account in her name and controlled by her, and then converted those funds into cashiers' checks and cash, which she then transferred to other participants in the fraud scheme.

In violation of Title 18, United States Code, Sections 1344 and 2.

COUNT II
(Conspiracy to Commit Mail and Wire Fraud)

15. The allegations contained in paragraphs 1 through 12 of this Indictment are re-alleged and incorporated by reference as if fully set out herein.

16. Beginning at a time unknown to the Grand Jury, but including June 9, 2020, and continuing to on or about November 3, 2020, in Dunklin County, in the Southeastern Division of the Eastern District of Missouri, and elsewhere, the defendant,

SHERI L. REEVES,

and persons, known and unknown to the Grand Jury, did knowingly and willfully combine, conspire, confederate and agree with each other and persons, known and unknown to the Grand Jury, to commit the following offenses against the United States:

- a. to use private and commercial interstate carriers, in executing, and attempting to execute, the aforesaid scheme and artifice to defraud to obtain money and property, in violation of Title 18, United States Code, Section 1341; and
- b. to transmit and cause to be transmitted by means of wire communications in interstate commerce, any writings, signs, signals, pictures, and sounds for the purpose of knowingly executing and attempting to execute, the aforesaid scheme and artifice to defraud to obtain money and property, in violation of Title 18, United States Code, Section 1343.

All in violation of Title 18, United States Code, Section 1349.

COUNT III
(Wire Fraud)

17. The allegations contained in paragraphs 1 through 12 of this Indictment are re-alleged and incorporated by reference as if fully set out herein.

18. Beginning at a time unknown to the Grand Jury, but including between October 20, and November 3, 2020, in Dunklin County, in the Southeastern Division of the Eastern District of Missouri, and elsewhere, the defendant,

SHERI L. REEVES,

did aid and abet persons known and unknown to the Grand Jury, and for the purpose of executing the aforesaid scheme and artifice to defraud in order to obtain money and property, did transmit and caused to be transmitted in interstate and foreign commerce, by means of wire communications, writings, signs and signals, pertaining to wire transfers of fraudulently obtained funds to Reeves' personal account with Bank of America in Jonesboro, Arkansas, from a Bank of America account in Texas, in the total amount of \$565,000.00, and pertaining to wire transfers from Dunklin County, Missouri, by Defendant converting some of the proceeds of the fraudulently obtained funds into cryptocurrency, and transmitting the cryptocurrency in interstate and foreign commerce to others using Coin Flip devices, all in violation of Title 18, United States Code, Section 1343.

A TRUE BILL.

FOREPERSON

SAYLER A. FLEMING
United States Attorney

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Assistant United States Attorney